



Owens Valley Indian Water Commission

June 8, 2011

California Department of Water Resources
Division of Integrated Regional Water Management
Financial Assistance Branch
Post Office Box 942836
Sacramento, CA 94236
Attn: Trevor Joseph

Re: Objection to the Proposition 84 Preliminary Round 1 Implementation Funding recommendations of the California Department of Water Resources and support for funding the Inyo-Mono Regional Water Management Group proposals

Dear Mr. Joseph and California Department of Water Resources,

The Owens Valley Indian Water Commission (Commission) is a Tribal consortium composed of representatives from the Bishop Paiute Tribe, the Big Pine Paiute Tribe of the Owens Valley, and Lone Pine Paiute-Shoshone Reservation, all disadvantaged communities located in the Owens Valley in Inyo County, California. The Commission is a member of the Inyo-Mono Integrated Regional Water Management Group (I-M IRWMG) and, as such, we wish to comment on the process followed by the California Department of Water Resources (DWR) in their preliminary implementation funding recommendations for the first round of Proposition 84 grants.

The Round 1 Implementation Proposal Solicitation Package emphasized the intention to use Proposition 84 to provide funding to Disadvantaged Communities (DACs) for water projects serving those communities. However, from the outcome of DWR's preliminary recommendations, it seems that more scoring weight was actually given to the proposals of the IRWM Regions that were wealthy enough and well established enough to have the dollars needed to produce the most polished proposals. It is unclear to us how projects benefiting DACs were given more weight in the scoring process that DWR followed in producing their preliminary recommendations for Round 1 Implementation funding. An early 2011 survey conducted by the IRWM Roundtable of Regions soon after the Round 1 proposals were submitted to DWR showed that among the 27 IRWM Regions that responded to the survey, the average amount spent to prepare a full implementation proposal for Round 1 Prop 84 funding was \$115,053 with an average cost of \$16,500 for each project proposal application. This is far more than the I-M IRWMG, which is a region of largely disadvantaged rural communities, had to spend to prepare this proposal. We would argue that expecting the recipients of Prop 84 funding to expend this amount of money in order to submit a competitive proposal for funding from a water bond passed by the citizens of California is wrong; it puts Regions with more recently established IRWMGs and with fewer financial resources at a competitive disadvantage, while these are the Regions that are probably most in need of the water bond funding. Such a scoring process also favors Regions proposing fewer more centralized and expensive projects, whereas the I-M IRWMG proposed a number of small, less expensive projects that would benefit the small, widely spaced, rural communities that make up our Region.

Several of the Owens Valley Indian Tribes submitted preliminary implementation proposals for Round 1 grants that were ranked highly by the I-M IRWMG so that they would have been given high priority for funding in the Group's funding proposal. However, because of a lack of monetary and technical resources none of the Tribes were able to complete their applications for Round 1 funding. Unless Proposition 84 funding is meant to go to only wealthy, well established Regions, extra funding should be given to the rural Regions that are rich only in the number of the disadvantaged communities and small rural communities that exist within their boundaries to help them build capacity and to begin to level the playing field.

In closing we want to respectfully urge DWR to revise their Preliminary Round 1 Implementation Funding recommendations to provide funding for the Inyo-Mono Integrated Regional Water Management Group in this first round of the Proposition 84 Implementation Grants. The Inyo-Mono Region has extreme needs for this funding. Our Round 1 Implementation proposal included funding to take steps to provide potable water to schools and small communities now lacking access to clean drinking water, to provide funding for several small community services districts to improve or maintain their drinking water and sewage treatment facilities, to write flood plans, and many other worthy projects. We believe that these are the sorts of projects that California voters were voting to support when they passed Proposition 84. Thank you for the opportunity to provide feedback on DWR's Round 1 Implementation recommendations.

Sincerely,

A handwritten signature in blue ink that reads "Teri Red Owl". The signature is fluid and cursive, with the first name "Teri" being more prominent than the last name "Red Owl".

Teri Red Owl
Executive Director
Owens Valley Indian Water Commission

Cc: Bishop Paiute Tribe, Big Pine Paiute Tribe of the Owens Valley, Lone Pine Paiute-Shoshone Reservation, Owens Valley Tribal Environmental Departments; Inyo-Mono Regional Water Management Group; file